REPUBLIC OF NAMIBIA

MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM

OFFICE OF THE ENVIRONMENTAL COMMISSIONER

Decommissioning Questionnaire & Site Closure Plan

1. GENERAL PROJECT INFORMATION

1.1 Company Name**: Mobile Telecommunication Limited (MTC Namibia)**

1.2 Proponent/Owner: **Mobile Telecommunication Limited (MTC Namibia)**

1.3 Site Name, Location, and Region

Terrace Bay Tower Site, Terrace Bay, Kunene Region

1.4 Title of Activity to be Decommissioned

The Decommissioning of the Existing MTC Network Site (48m guyed mast structure) in Terrace Bay, Kunene Region

1.5 Reason for Decommissioning (e.g., end of life, closure, relocation):
The decommissioning of the current tower is triggered by the dilapidated state and high maintenance costs compared to lattice tower structures. The Terrace Bay mast is currently unsafe for use and beyond repair, and therefore requires replacement. This was reported by the MTC Namibia Team that assessed the structural integrity and safety of the site on 10th of February 2026. Therefore, to ensure a continued network service for the area and a reliable connection for the communities in the area, there is consideration to replace the current tower with a 25m lattice structure. However, if planning anticipates future microwave links to new sites, a 48m tower may still be required. Once replaced, anti-corrosion treatment and repainting should be done strictly in accordance with the tower manufacturer's maintenance instructions.

1.6 Proposed Start and End Date of Closure:
The start date is not yet determined, but work is planned to commence soon to ensure safety and the continued provision of services (both voice and data) in the Terrace Bay and surrounding areas. The decommissioning duration is about 4 weeks (1 month), and the tower replacement work would take 2 to 4 months. Therefore, the exact dates will be confirmed by MTC Namibia and the contractor.

1.7 Current Land Zoning:
Protected conservation/national park land within Skeleton Coast National Park.

2. SITE DESCRIPTION AND ACTIVITY BACKGROUND

2.1 Provide a detailed description of the site to be decommissioned (including site coordinates in decimal degrees).

The site comprises an existing 48 m high guyed telecommunications tower with associated support infrastructure within Terrace Bay in the Skeleton Coast National Park at coordinates: -19.993060, 13.039530. The area is remote, coastal, and environmentally sensitive, characterized by desert conditions and proximity to the Atlantic coastline. The site was established/commissioned in 2006, and contains the existing telecommunications tower, antennae, tower, anchor foundations, guy ropes, the tower's horizontal and vertical members, and the vertical alignment, cables, power units, and supporting infrastructure that require decommissioning and replacement.

2.2 Are there existing Environmental Management Plans / Programmes (EMPr) for the site? If Yes, indicate below which EMPr and date approved. Yes: _____ No: _ **X** _

Yes, an EMPr or an Environmental Decommissioning and Infrastructure Replacement Management Plan (EDIRMP) has been developed for the site activities. Therefore, the EMPr/EDIRMP has been submitted to the Office of the Environmental Commissioner on the 14th of April 2026, and the soft copy has been uploaded to the ECC Portal.

ECC number: **There has not been an ECC issued to the site as it was commissioned in 2006, and an application has been recently made under APP-007276. Therefore, the site ECC would be confirmed by the MEFT (Office of the Environmental Commissioner) should it be issued.**

2.3 Attach a site map indicating the area to be decommissioned. **Please refer to the end of the Form and EDIRMP document.**

2.4 List all hazardous materials (chemicals, asbestos, fuel) still present on-site
The potential waste to be generated from the site decommissioning and replacement activities includes waste oils, diesel/fuel residues, corroded metal components, electronic waste (e-waste), potential asbestos-containing materials, potential lead-containing materials, batteries, and contaminated personal protective equipment (PPE).

2.5 What is the intended final land use (e.g., industrial, agriculture, residential, natural habitat)?

Continued telecommunications infrastructure use (enhanced) within the existing conservation land use.

2.6 Outline the plan for dismantling, deconstruction, and site stabilization

The tower and associated infrastructure will be dismantled using cranes, rigging equipment, and sectional dismantling techniques where required. Equipment, cables, antennae, and foundations will be removed. Excavations will be backfilled, disturbed surfaces rehabilitated, and waste removed to approved disposal facilities.

3. ENVIRONMENTAL AND SAFETY ASSESSMENT (PRE-CLOSURE)

3.1 Have potential impacts on air quality, water sources, and soil been identified?

Yes: X No: _____, If Yes, please list below which potential impacts were identified:

Dust generation, noise impacts, hydrocarbon spills, soil contamination, waste generation, visual impacts, occupational health and safety risks, traffic impacts, and potential erosion from disturbed surfaces.

3.2 Are there known hazardous materials, spills, or contamination on site?

Yes: X No: _____. If Yes, please indicate what remediation measures were employed:

Mitigation/remediation measures: The use of drip trays, spill kits onsite, proper hazardous waste storage, removal to approved hazardous waste facilities, and controlled handling of hazardous materials

3.3 What is the distance to the nearest residential area or water body?

The nearest residential/service accommodation area is approximately 300 to 800m. The nearest water body is the Atlantic Ocean coastline, which is about 150 to 400m.

3.4 Are there any protected species or cultural heritage sites to consider? Yes: _____ **x** __
No: _____. If Yes, please list identified species or heritage siting:
The site falls within the environmentally sensitive Skeleton Coast National Park, and precautionary measures for biodiversity and heritage protection will apply as recommended in the EDIRMP.

3.5 What measures are in place to prevent soil erosion or groundwater contamination (if applicable)?

The use of drip trays under machinery, immediate spill cleanup, controlled fuel storage, backfilling excavations, minimization of disturbed areas, and proper waste handling and disposal.

4. DECOMMISSIONING METHODOLOGY (EXECUTION PLAN)

4.1 How will infrastructure be removed? (e.g., dismantling, demolition, excavation).
Infrastructure will be removed through: dismantling, crane-assisted removal, excavation of foundations, and sectional dismantling where required.

4.2 What is the plan for removing hazardous materials? (e.g., asbestos removal, sludge removal from tanks).

Hazardous materials will be identified and segregated, stored in approved containers, transported by approved waste handlers, and disposed of at approved hazardous waste facilities in Walvis Bay or Windhoek.

4.3 Will the site be rehabilitated or re-purposed for any new use? (e.g., remediation, backfilling). Yes: **x** No: _____, if Yes, please indicate proposed new uses below:

The site will be rehabilitated and reused for replacement telecommunications infrastructure.

4.4 What are the safety measures for workers on site? (e.g., PPE, site access control).
Personal Protective Equipment (PPE) such as helmets, harnesses, gloves, boots, overalls, barricading, warning signage installation, first aid kits (and training on administering), fall arrest systems, and supervision by safety personnel.

4.5 What measures are in place to secure the site during decommissioning (fencing, security guards)?

Temporary barricades, restricted access, warning signage, and long-term fencing/barricading of the tower site and associated infrastructures to ensure controlled entry to work areas, protection against theft and vandalism.

4.6 Has a strategy been developed for the health and safety of workers involved in demolition? Yes: X No: ____, if yes, please provide details below:

The strategy includes health, safety & environmental (HSE) supervision, compliance with ISO 14001:2015, toolbox talks, emergency response procedures, and safe working-at-height procedures

5. WASTE MANAGEMENT PLAN

5.1 What types of waste will be generated? (e.g., hazardous, non-hazardous, scrap metal, construction rubble).

Scrap metal, rubble, cables, general domestic waste, hazardous waste, waste oils, fuel-contaminated materials, and e-waste.

5.2 Where will waste be disposed of? (Must be a registered landfill site, with valid Environmental Clearance certificates).

The general waste will be disposed of at the nearest approved waste management facility in the region or neighbouring regions, while the hazardous waste will be disposed of at the approved hazardous waste management facility in Walvis Bay or Windhoek

5.3 Is any equipment to be reused or recycled? Yes: X No:_____, if yes, provide details below:

Functional tower components, antennae, cables, and electronic equipment may be salvaged, reused, recycled, or sold.

6. SOCIO-ECONOMIC CONSIDERATIONS

6.1. Will the decommissioning cause economic displacement for individuals using the land (e.g., grazing, informal farming)? Yes:____ No:__X__, if yes, please provide details below:

No grazing or farming displacement is anticipated due to the existing disturbed telecommunications footprint.

6.2 What is the plan for managing staff layoffs or retraining, if applicable?

No significant layoffs anticipated. Temporary contractors will be utilized during decommissioning and replacement.

6. REGULATORY COMPLIANCE AND STAKEHOLDERS

6.1 Have you engaged with the local Authority, Regional Council, or Traditional Authority regarding site closure (please indicate which and attach evidence to this form)?

Yes. The authorities consulted are the MEFT: Directorate of Wildlife and National Parks (DWNP)(as the land custodian and the Kunene Regional Council (as the managing authority of the Terrace Bay Settlement). The proofs of engagement (and or letters of notice) are attached hereto.

6.2 Have you notified any other relevant stakeholders, e.g., the Organ of State of the intended decommissioning? Yes:_____ No:_____, if yes, please list below and provide evidence:

Yes. The authorities consulted are the MEFT: Directorate of Wildlife and National Parks (DWNP)(as the land custodian and the Kunene Regional Council (as the managing authority of the Terrace Bay Settlement). The proofs of engagement (and or letters of notice) are attached hereto.

6.3 How will local communities be notified of risks associated with decommissioning activities?

The local communities will be notified through public notices, direct communication, site signage, and contractor engagement with the surrounding community.

6.4 Have neighbouring property owners been notified?
No neighbours to the tower site.

7. Monitoring and Reporting

7.1. Describe the schedule for regular, independent monitoring of decommissioning progress

The EDIRMP has recommended that regular monitoring and inspections be carried out throughout decommissioning, waste handling, rehabilitation, and replacement construction.

Monitoring will be undertaken by the Site Manager and HSE/Safety Officer.

Declarations

I……**Mobile Telecommunication Limited (MTC Namibia)……** (Full name of **PROPONENT**) understand and agree that the information that I have provided in this questionnaire will be used by the Environmental Commissioner. I accept that the Environmental Commissioner will hold me accountable for any inaccurate or misleading information knowingly provided in this questionnaire, and acknowledge that the provision of such information will impede the lawful carrying out of the responsibilities.

SERJAHGE CONSULTANTS
CC/2020/0010007

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P.O. Box 27318, Windhoek
Namibia

Date: 05 May 2026

RECEIVED
2026 -05- 06
DWNP
By: Yvonne Nakatana

Office of the Director

The Directorate of Wildlife and National Parks

Ministry of Environment, Forestry and Tourism

Private Bag 13306 Windhoek, Namibia

Attention: Mr. Bennett Kahuure

Dear Sir

Re: Notification and Submission of the Environmental Decommissioning and Infrastructure Replacement Management Plan (EDIRMP) for the Existing MTC Network Site (48m guyed mast structure with a 25m high lattice tower) in the Terrace Bay Settlement in the Kunene Region - ECC Application No. APP-007276

Mobile Telecommunications Limited (MTC Namibia) proposes to decommission and replace the existing 48m high guyed mast network tower (with a 25m high lattice tower) in Terrace Bay Settlement at these GPS coordinates: -19.993060, 13.039530, within the Skeleton Coast National Park, Sesfontein Constituency of the Kunene Region.

The intention to decommission the current tower is triggered by the dilapidated state and high maintenance costs compared to lattice tower structures. The Terrace Bay mast is currently unsafe for use and beyond repair, and therefore requires replacement. However, to ensure a continued network service for the area and a reliable connection for the communities in the area, there is consideration to replace the current tower with a 25m lattice structure. However, if planning anticipates future microwave links to new sites, a 48m tower may still be required. Once replaced, anti-corrosion treatment and repainting should be done strictly in accordance with the tower manufacturer's maintenance instructions.

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Date: 26 May 2026

KUNENE REGIONAL COUNCIL
PRIVATE BAG 502, OPUWO
Philongo
2026 -05- 26
TEL: 065-273950
FAX: 065-273077
RECEIVED

Office of the Chief Regional Officer

Kunene Regional Council

Private Bag 502 Opuwo, Namibia

Attention: Mr. George Kamseb

Dear Sir

Re: Notification and Submission of the Environmental Decommissioning and Infrastructure Replacement Management Plan (EDIRMP) for the Existing MTC Network Site (48m guyed mast structure with a 25m high lattice tower) in the Terrace Bay Settlement in the Kunene Region - ECC Application No. APP-007276

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It is important to note that the tower was erected in 2006, before the promulgation of the EMA and its 2012 EIA regulations in 2007 and 2012, respectively. However, the tower has never been cleared environmentally. Therefore, to comply with the EMA and its Regulations and ensure environmental sustainability, MTC Namibia appointed Serja HGE Consultants to develop this document, alongside the ECC application/notice of old tower closure and replacement for submission and evaluation at the Office of the Environmental Commissioner for consideration of the tower ECC.

Serja HGE Consultants hereby submits the Environmental Decommissioning and Infrastructure Replacement Management Plan (EDIRMP) to your office as notice of this new development surrounding the telecommunication network tower in Terrace Bay Settlement.

Should you or your office require further information, please do not hesitate to contact us.

Yours sincerely,

.....

Ms. Fredrika Shagama: Principal Environmental Assessment Practitioner & Hydrogeologist

Professional Affiliations/Associations: Environmental Assessment Professionals of Namibia (EAPAN) – Practitioner, Membership No. 183; Geoscience Council of Namibia (GSCN) – Geoscientist, Registration No. GSCN/G-057; International Association of Hydrogeologists (IAH) - Full Member, Membership No.139790; Namibian Hydrogeological Association (NHA) – Member)

Serja Hydrogeo-Environmental Consultants CC

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P.O. Box 27318, Windhoek
Namibia

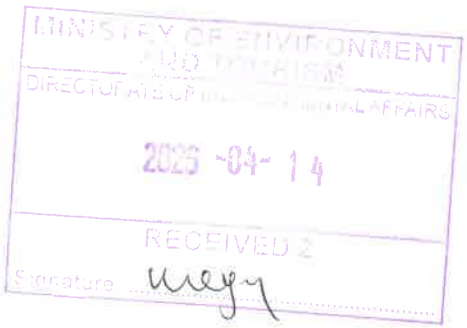
Date: 14 April 2026

The Office of the Environmental Commissioner

Department of Environmental Affairs and Forestry

Ministry of Environment, Forestry and Tourism

Private Bag 13306 Windhoek, Namibia



Attention: Mr. T. Mufeti

Dear Sir

Re: Submission of the Environmental Decommissioning and Infrastructure Replacement Management Plan (EDIRMP) for the Existing MTC Network Site (48m guyed mast structure) in Terrace Bay in the Kunene Region - ECC Application No. APP-007276

Mobile Telecommunications Limited (MTC Namibia) proposes to decommission and replace the existing 48m high guyed mast network tower in Terrace Bay Settlement at these GPS coordinates: -19.993060, 13.039530, within the Sesfontein Constituency of the Kunene Region.

The tower was erected in 2006, before the promulgation of the EMA and its 2012 EIA regulations in 2007 and 2012, respectively. Therefore, it has never been cleared environmentally. Therefore, to comply with the EMA and its Regulations and ensure environmental sustainability, MTC Namibia appointed Serja HGE Consultants to develop this document, alongside the ECC application/notice of old tower closure and replacement for submission and evaluation.

Serja HGE Consultants hereby submits the Environmental Decommissioning and Infrastructure Replacement Management Plan (EDIRMP) for your evaluation and ECC consideration.

Should you or your office require further information, please do not hesitate to contact us.

Yours sincerely,

Ms. Fredrika Shagama: Principal Environmental Assessment Practitioner & Hydrogeologist

Serja Hydrogeo-Environmental Consultants CC

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Revenue Stamps

NAMIBIA
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N$100

ANNEXURE 1

FORMS

Form 1

REPUBLIC OF NAMIBIA

ENVIRONMENTAL MANAGEMENT ACT (No. 7 of 2007)

(Section 32)

APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC APP NO. 007276)

PART A: DETAILS OF APPLICATION

PROPONENT/APPLICANT'S INFORMATION:	**ENVIRONMENTAL CONSULTANT'S INFORMATION:**
1. **Name (Person or Business):** Mobile Telecommunications Limited 2. **Business Registration / Identity No.:** CY/1994/0458 3. **Correspondence Address:** P. O. Box 23051 Windhoek, Namibia 4. **Name of Contact Person:** Mr. Tuhafeni Erastus 5. **Position of Contact Person:** Transmission Engineering Technician 6. **Telephone No.** +264 81 325 1726 7. **Fax No:** N/A 8. **E-mail Address:** TErastus@mtc.com.na	1. **Name (Person or Business):** Serja Hydrogeo-Environmental Consultants cc 2. **Business Registration / Identity No:** CC/2020/001/0007 3. **Correspondence Address:** P. O. Box 27318 Windhoek 4. **Name of Contact Person:** Ms. Fredrika Shagama 5. **Position of Contact Person:** Environmental Assessment Practitioner 6. **Telephone / Mobile No.:** +264 (0) 81 749 9223 7. **Fax No:** Not Applicable 8. **E-mail Address:** info@serjaconsultants.com

PART B: SCOPE OF THE ENVIRONMENTAL CLEARANCE CERTIFICATE

1. THE ENVIRONMENTAL CLEARANCE CERTIFICATE IS FOR:

The 'listed activities' that are relevant or related to the proposed activities are listed below:

INFRASTRUCTURE

-Listed Activity 10: Infrastructure 10.1 the construction of-

(g) Communication networks, including towers, telecommunication, and marine telecommunication lines and cables;

(j) Masts of any material or type and any height, including those used for telecommunication, broadcasting, and radio transmission, but excluding - (i) flag poles; and (ii) lightning conductor poles.

2. DETAILS OF THE ACTIVITY(S) COVERED BY THE ENVIRONMENTAL CLEARANCE CERTIFICATE:

2.1 Title of Activity

Environmental Clearance Certificate (ECC) for the Decommissioning and Infrastructure Replacement for the Existing MTC Network Site (48m guyed mast structure) in Terrace Bay in the Kunene Region

2.2 Location of Activity

Constructed in 2006, the 48m guyed mast network tower is located in Terrace Bay Settlement, and is located at these GPS coordinates -19.993060, 13.039530 within the Sesfontein Constituency, Kunene Region. The locality map is provided in the accompanying Environmental Decommissioning and Infrastructure Replacement Management Plan (EDIRMP).

2.3 Nature of Activity

The Decommissioning and Infrastructure Replacement for the Existing MTC Network Site (48m guyed mast structure) in Terrace Bay in the Kunene Region

2.4 Scale and Scope of the Activity

The project scale is small and localized. The proposed project activities will entail the decommissioning (discontinuing the operations) of the 48m-high guyed mast structure (network tower) in Terrace Bay Settlement by the MTC Namibia-appointed decommissioning & tower replacement contractor (the decommissioning & infrastructure replacement contractor).

Decommissioning Activities

The duration for decommissioning works is anticipated to last between three and four weeks, i.e., one month or a little longer. The key anticipated activities for the decommissioning works will include, but not be limited to:

Planning, permits, and mobilization: about 5 to 10 days

- It is during this stage that MTC Namibia, alongside its decommissioning & infrastructure replacement contractor, will determine how to do the decommissioning activities safely and efficiently. If not yet done, the structural integrity of the tower will be inspected and checked for any signs of damage, corrosion, or wear and tear. Moreover, the condition of the equipment attached to the tower, like antennas and cables, will be assessed to help determine if any parts can be salvaged (to be sold) or reused (in other projects).

Disconnection and Equipment Removal: Duration of 1 to 2 days

- After the planning and assessment phase (stage), it is during this stage that the Decommissioning & Tower Replacement Contractor will start disconnecting and removing the equipment from the tower. This includes removing equipment such as antennas, cables, lines, shelters, power units, and any other electronic devices that are attached to the tower. This process will start with shutting down all the power to the equipment to ensure the safety of the decommissioning workers. Carefully, cables are disconnected, and the antennas are removed.
- Once the equipment is removed, it is properly stored and transported off-site. All parts are labelled to easily identify them later. If any of the equipment is still functional, it might be considered for sale, donated to other organizations, or used in other new projects (communication systems).

Tower dismantling: Duration of 3 to 5 days

- There are a few different methods we can use to take down a tower, depending on its size and location. The common method is using a crane. The crane will be attached to the top of the tower and slowly lowered to the ground. This method is usually used for smaller towers or towers that are located in areas with enough space for the crane to operate. Therefore, this will be used to dismantle the Terrace Bay tower.

  For larger towers, we might use a technique called sectional dismantling. This involves cutting the tower into smaller sections and then removing each section one by one. It can be a more time-consuming process; however, it is often necessary for taller towers. Furthermore, during the dismantling process, extra precautions are taken to ensure the safety of the workers and the surrounding environment. Safety equipment like harnesses and helmets will be used, and all safety guidelines will be followed. This will also be done carefully to avoid damaging any nearby structures or power lines.

Site Rehabilitation and Restoration: Duration of 3 to 5 days

Once the tower has been completely dismantled or demolished, the site will be cleaned up and restored to its original condition (pre-tower construction) as much as possible, i.e., rehabilitation of the disturbed land and the area around the decommissioned site. This includes removing all the debris and waste from the site. Hazardous waste, including any hazardous materials, like asbestos or lead, will be properly disposed of in accordance with the environmental regulations.

Site rehabilitation following tower decommissioning will include the following:

- The removal of all infrastructure
- Backfilling of excavations (the excavated tower holes left by the tower foundation will be backfilled to help to prevent any safety hazards and ensure that the site is stable and safe).
- Recontouring of the land

- Erosion control and re-vegetation using indigenous species, where possible

Any contaminated materials will be removed and disposed of at the nearest approved waste management sites (for all waste except hazardous waste, which will be disposed of either in Walvis Bay (if there is capacity) or in Windhoek). The site will be restored to a stable, environmentally acceptable condition, with post-rehabilitation monitoring to ensure the environment's successful recovery post-disturbance. It is important to note that the duration of individual activities listed above may be affected by different factors. The anticipated duration (schedule) can be affected by the mobilisation and logistics, which could take longer than the actual dismantling, the availability of the right rigging crews, and weather (wind) conditions (especially in that part of the Kunene Region) that can pause work for safety.

Tower Replacement (New Tower Construction)

- The same contractor appointed for the decommissioning works will be responsible for the replacement (construction and installation) of the old and decommissioned tower. Therefore, once the old tower structure is decommissioned, it will be replaced by a new structure that will be mounted to a concrete foundation and will be similar to the old structure; it will not require any supporting cables.
- The new structure to replace the current Terrace Bay site is a 25m high lattice telecommunication structure that will host 3x dual-band antennae and 1x microwave dish. However, if planning anticipates future microwave links to new sites, a 48m tower may still be required (Klein and Shishiveni, 2026). The physical assembling of the network structure and the construction of the foundations will take place on the site by using manual labour as far as possible.
- The Construction activities will include excavation, concrete civil works, and tower rigging. There will be minimal earthworks required to prepare the site for the new tower construction and installation. The construction work is anticipated to take 2 to 3 months, and the construction activities will be limited to normal working hours, i.e., 08h00 and 17h00.

  MTC and its appointed contractor for the decommissioning and tower replacement/construction will be required to adhere to health, safety, and environmental requirements for construction and operation (as well as maintenance) as presented in this document for the project activities.

The project requirements (human resources, technology, equipment, etc.) are described in the EDIRMP.

PART C: DECLARATION BY APPLICANT

I hereby certify that the particulars given above are correct and true to the best of my knowledge and belief. I understand the environmental clearance certificate may be suspended, amended, or cancelled if any information given above is false, misleading, wrong, or incomplete.

Signature of Applicant	**FREDRIKA SHAGAMA** Full Name in Block letters	**Environmental Assessment Practitioner** Position
		Serja Hydrogeo-Environmental Consultants
on behalf of **Mobile Telecommunications Limited**		13 April 2026 **Date**